

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
In re:	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	:
Debtors.	:
	X

**DECLARATION OF CHRISTOPHER J. LUCHT IN FURTHER SUPPORT
OF LEHMAN BROTHERS HOLDINGS INC.'S MOTION FOR LEAVE TO
AMEND AND EXTEND THE SCOPE OF THE ALTERNATIVE DISPUTE
RESOLUTION PROCEDURES ORDER FOR INDEMNIFICATION
CLAIMS OF THE DEBTORS AGAINST MORTGAGE LOAN SELLERS**

I, Christopher J. Lucht, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney at the law firm Wollmuth Maher & Deutsch LLP, counsel for Plaintiff Lehman Brothers Holdings Inc. ("LBHI") in the above-captioned proceeding. I am familiar with the facts set forth herein on the basis of my personal knowledge and my review of documents in possession of my firm.

2. I submit this declaration in further support of Plaintiff's Motion for Leave to Amend and Extend the Scope of the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Sellers (the "Motion").

3. Annexed hereto as Exhibit A is a true and correct copy of an email chain among Lani Adler, James Lawlor, Adam Bialek, and Brant Kuehn from January through February 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 3, 2021

/s/ Christopher J. Lucht
Christopher J. Lucht